

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PFIZER INC. SECURITIES LITIGATION

No. 04-cv-9866 (LTS)(HBP)

ECF CASE

**NOTICE OF PLAINTIFFS' MOTION (1) FOR PRELIMINARY APPROVAL OF
PROPOSED SETTLEMENT, (2) FOR APPROVAL OF THE FORM AND MANNER
OF NOTICE, AND (3) TO SCHEDULE A HEARING ON FINAL
APPROVAL OF THE SETTLEMENT AND ON PLAINTIFFS' COUNSEL'S
APPLICATION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

PLEASE TAKE NOTICE, that upon the accompanying Declaration of James J. Sabella and the exhibits thereto; the accompanying Memorandum of Law; and all other papers and proceedings herein, the undersigned will move this Court, at the courthouse at 500 Pearl Street, New York, NY, on September 13, 2016 at 12:30 p.m., pursuant to Rule 23 of the Federal Rules of Civil Procedure, for an order (i) preliminarily approving the proposed settlement of this action, (ii) approving the form and manner of notice, and (iii) scheduling a hearing on final approval of the Settlement and on Plaintiffs' Counsel's application for an award of attorneys' fees and expenses; and for such other and further relief as the Court deems proper and just.

A copy of the Parties' agreed-upon Proposed Order Preliminarily Approving Settlement, Directing Notice to Class Members, and Setting Hearing for Final Approval of Settlement is attached hereto as Exhibit A.

Dated August 26, 2016

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Respectfully submitted,

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